

# Exhibit A



and Mr. Tumati also hired Laura Amster and Julie Gi Kim on to the proposal effort based on Ms. Sawin's recommendation.

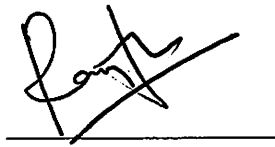
4. On April 23 2015, Ms. Sawin invited me to her apartment to work at cafe in her apartment complex. I never asked me her to invite me to her apartment complex or to work there.
5. On May 6, 2015 afternoon, Ms. Sawin and I along with a couple of our colleagues worked out of Deloitte's Tysons Corner office. After working into the late evening, our Manager Bheeshma Tumati invited our team including Ms. Sawin and I for a happy hour at Gordon Biersch in Tysons Corner Mall. I said to the team that I would be shopping in the mall as we departed out of Gordon Biersch. Ms. Sawin requested me to drop her in DC or Rosslyn and asked me to let her know when I'm done with my shopping. I proceeded to shop at Barnes & Nobles and Macys. Ms. Sawin proceeded to shop at some other stores. While I was at Macy's waiting for the fitting rooms to be free, I received a text message from Ms. Sawin stating "I'm making moves" and "I'm in express". I replied to her that "Now I'm in macy's". Subsequently Ms. Sawin came over towards Macy's. We met in front of Macy's and proceeded towards the parking lot. While we were walking Ms. Sawin told me that she was shopping for a formal dress for a concert she was going to attend later that week. While we were driving back, we had a casual chat about non-work related matters. Ms. Sawin and I were friends on Facebook that time. I told her that she looked different in her Lehigh University graduation picture. For some reason, Ms. Sawin believed that she looked fatter and uglier than in her graduation picture and was unhappy. I told her that I did not mean that. I subsequently dropped her in Washington D.C. After I got home I sent a text message clarifying that I didn't mean that she was fat and ugly. In order to make sure that she didn't feel hurt and to cheer her up I texted, "I'm sorry Didn't mean to hurt you" and "You're cute slim and sexy!". She replied, "It's okay". The next day I ran into her near the cafeteria on the fourth floor. She said, "It's all good" with respect to the previous night's misunderstanding. *See* Ex 3.
6. On May 10, Ms. Sawin sent me an invite on LinkedIn. *See* Ex 4.

7. On May 13, 2015 evening, Ms. Sawin and I were working together at Deloitte Arlington office. Ms. Sawin asked me if I was attending the Asian Business Resource Group (“ABRG”) happy hour at Café Asia in Arlington, VA. I informed her that I did not know about the event and can attend. Ms. Sawin and I carpooled from Deloitte office to Café Asia. While we were entering Café Asia, we were greeted by Neel Sanghvi, a BTA at Deloitte. Subsequently, I had a chat with Mr. Sanghvi when he stated that another Deloitte BTA Vikram Rajan had a romantic interest in Ms Sawin. Ms. Sawin had introduced me to Mr. Rajan before. Mr. Sanghvi also alleged that I had a romantic interest in Ms. Sawin. I did not respond to his frivolous accusation. However, I informed Ms. Sawin about Mr. Sanghvi’s allegations via Lync message. *See Ex 5.*
8. On May 28, 2015, Ms. Sawin and I attended an Armed Forced Business Resource Group (“AFBRG”) event at Deloitte office. The event was a book signing event with Gayle Tzemach Lemmon, author of “Ashley’s War”. *See Ex 6.* The conversation between Ms. Sawin and I involved her stating that both her “grandpas” served in the military and she continued talking about her grandparents. Ms. Sawin also stated that her racist white grandparents on her father’s side did not talk to her grandparents on her mother’s side for a long time because they were of Japanese Origin.
9. On May 29, Ms. Sawin and I attended ABRG Asian Pacific Heritage Month event at Deloitte office. The conversation primarily involved Ms. Sawin talking about her Memorial Day long weekend hanging out with her Lehigh University friends. It was nothing related to the CMS proposal work.
10. Based on the text messages I received from Ms. Sawin, it appeared to me that Ms. Sawin had completely misunderstood the nature of our relationship. So, on May 30, 2015, I wrote a letter to her expressing my desire to stay away from her, not to contract me regarding FPS proposal effort and directed her to contact Mr. Tumati or Mr. Verma. *See Ex 7.* I never attempted to retaliate against her and never told her that she is no longer needed on the FPS proposal effort. I also sent her a follow-up note asking her if she had

any questions regarding my e-mail.

11. From early April thru end of May, 2015, I witnessed Stacy Sawin using her Deloitte corporate phone to send explicit text messages as well as explicit images using Snapchat. I also saw OkCupid app on her Deloitte corporate phone and had once even told her that installing dating apps violates Deloitte's policies.
12. On June 10, 2015 at 3 PM, I was asked to meet Alicia Carberry, a Senior Manager with Deloitte Talent (HR). Ms. Carberry's behavior was hostile towards me. It appeared as if she had already made up her mind to fire me. She also forcibly took away my laptop despite me stating that I would like to send her further documents in support of my answers.
13. Deloitte Defendants tried their best to withhold responsive documents about investigations conducted by them. They delayed the production of these responsive records by more than 79 days. Finally, on March 24, 2017 following a motion to compel, they produced responsive documents related to these investigations. These documents conclusively proved that Alicia Carberry lied to Deloitte leadership that I lied to her, turned a blind eye towards Ms. Sawin's multiple violations of Deloitte policies and asked her deputy Leslie Moore Garcia to report to Deloitte Talent Leadership that Ms. Sawin did not violate any Deloitte policies.
14. I also informed Deloitte Defendants that I would like to correct/supplement my deposition transcript based on recently discovered information pursuant to Fed R. Civ. P. 30(e) within 30 days of its publication. Deloitte Defendants refused to allow me to correct/supplement my deposition transcript. Hence my depositions transcript is inaccurate and does not reflect answers that are to the best of my current knowledge.

Dated: April 21, 2017  
Catonsville, Maryland

A handwritten signature in black ink, appearing to be 'Ranjith Keerikkattil', written over a horizontal line.

Ranjith Keerikkattil

**EXHIBIT 1 TO KEERIKKATTIL DECLARATION**

---

**From:** Sawin, Stacy (US - Arlington)  
**Sent:** Thursday, March 05, 2015 3:25 PM  
**To:** Keerikkattil, Ranjith (US - Arlington)  
**Subject:** IM All Hands Follow-up

Hi Ranjith,

It was nice meeting you yesterday at the IM All Hands Event. Thank you for offering to send me information about SWAT Proposal Training and SAS Training. I am actively seeking ways to learn more about Deloitte and IM topics, so I truly appreciate your willingness to advice and help me.

Best Regards,  
Stacy

**Stacy Sawin**  
Business Technology Analyst  
Deloitte Consulting LLP  
Tel/Direct: +1 571 841 7784 | Mobile: +1 503 380 3915  
[Ssawin@deloitte.com](mailto:Ssawin@deloitte.com) | [www.deloitte.com](http://www.deloitte.com)

Please consider the environment before printing



**EXHIBIT 2 TO KEERIKKATTIL DECLARATION**

## **Keerikkattil, Ranjith**

---

**From:** Sawin, Stacy (US - Arlington)  
**Sent:** Tuesday, April 14, 2015 10:56 AM  
**To:** Sawin, Stacy (US - Arlington); Keerikkattil, Ranjith (US - Arlington)  
**Subject:** Conversation with Sawin, Stacy (US - Arlington)

**Sawin, Stacy (US - Arlington) [10:30 AM]:**

Hi Ranjith! How are you doing?

**Keerikkattil, Ranjith (US - Arlington) [10:30 AM]:**

Hey Good. How are you?

How's your BEP engagement going?

Are you still in Rosslyn?

**Sawin, Stacy (US - Arlington) [10:31 AM]:**

I'm doing well. However, I'm no longer part of the BEP engagement, which is actually why I wanted to reach out to you. I'm between projects and have a bit of extra time. Is there anything I can help you with?

**Keerikkattil, Ranjith (US - Arlington) [10:36 AM]:**

I'm involved with a proposal on the CMS account. We need support on creating architecture diagrams, meeting minutes, doing research online and things like that. Not sure if you are interested. It's a SAS based analytics platform we are proposing.

Are you currently looking for a project or waiting to be on-boarded to a different one?

**Sawin, Stacy (US - Arlington) [10:44 AM]:**

That sounds like something I would like to be involved with. Is there anything I get started on for the CMS proposal and/or materials to familiarize myself with the account? Also, I am currently looking for a project.

**Keerikkattil, Ranjith (US - Arlington) [10:48 AM]:**

Are you free around 12 today? I'm going for lunch with a consultant in IM. May be we can join us. We can talk then.

I know a specialist master who wants a BA/BTA for one of the CMS projects

I need to ask him if he needs an experienced hire with CMS experience or not

**Sawin, Stacy (US - Arlington) [10:53 AM]:**

I wish I could but I already have a lunch meeting. I'm free anytime after 1:15PM though, if you have any availability later in the day

**Keerikkattil, Ranjith (US - Arlington) [10:55 AM]:**

Okay. Let me see. I have a 3-4 and am meeting with my counselor at 5:30. So let's see 4. I'll ping you

---

**From:** Sawin, Stacy (US - Arlington)  
**Sent:** Monday, April 20, 2015 8:12 PM  
**To:** Keerikkattil, Ranjith (US - Arlington)  
**Subject:** RE: Hi

Hi Ranjith,

Thank you for sending me the Visio diagrams. I do have Visio installed on my laptop and am happy to get started.

Best Regards,  
Stacy

---

**From:** Keerikkattil, Ranjith (US - Arlington)  
**Sent:** Monday, April 20, 2015 8:04 PM  
**To:** Sawin, Stacy (US - Arlington)  
**Subject:** RE: Hi

You can re-use components from the attached Visio diagrams for our diagram than starting from scratch. Do you have Visio installed on your Deloitte laptop? If not search for Visio on DeloitteNet and you'll find the instructions to install from there.

**Ranjith Keerikkattil**  
Deloitte Consulting LLP  
1919 North Lynn Street, Arlington, VA, 22209  
Tel/Direct: +1 571 882 5816 | Mobile: +1 571 317 9772 | Fax: +1 855 344 9721  
[keerikkattil@deloitte.com](mailto:keerikkattil@deloitte.com) | [www.deloitte.com](http://www.deloitte.com)

Please consider the environment before printing.

---

**From:** Keerikkattil, Ranjith (US - Arlington)  
**Sent:** Monday, April 20, 2015 5:45 PM  
**To:** Sawin, Stacy (US - Arlington)  
**Cc:** Keerikkattil, Ranjith (US - Arlington)  
**Subject:** Re: Hi

Sure. I'll review it and get back to you by tomorrow.

Thanks!

**Ranjith Keerikkattil**  
Deloitte Consulting LLP  
1919 North Lynn Street, Arlington, VA, 22209  
Tel/Direct: +1 571 882 5816 | Mobile: +1 571 317 9772 | Fax: +1 855 344 9721  
[rkeerikkattil@deloitte.com](mailto:rkeerikkattil@deloitte.com) | [www.deloitte.com](http://www.deloitte.com)

Please consider the environment before printing.

On Apr 20, 2015, at 4:34 PM, Sawin, Stacy (US - Arlington) <[ssawin@deloitte.com](mailto:ssawin@deloitte.com)> wrote:

Hi Ranjith,

Attached are my first draft of the meeting minutes and a picture of the solution framework. I would greatly appreciate your feedback on the minutes, since it was my first time taking meeting notes. Please let me know how I can modify them to meet the proposal team's needs.

Best Regards,  
Stacy

---

**From:** Keerikkattil, Ranjith (US - Arlington)  
**Sent:** Monday, April 20, 2015 2:33 PM  
**To:** Sawin, Stacy (US - Arlington)  
**Subject:** RE: Hi

Cool. That works!

**Ranjith Keerikkattil**  
Deloitte Consulting LLP  
1919 North Lynn Street, Arlington, VA, 22209  
Tel/Direct: +1 571 882 5816 | Mobile: +1 571 317 9772 | Fax: +1 855 344 9721  
[rkeerikkattil@deloitte.com](mailto:rkeerikkattil@deloitte.com) | [www.deloitte.com](http://www.deloitte.com)

Please consider the environment before printing.

---

**From:** Sawin, Stacy (US - Arlington)  
**Sent:** Monday, April 20, 2015 2:33 PM  
**To:** Keerikkattil, Ranjith (US - Arlington)  
**Subject:** RE: Hi

Sure! Since we used my computer for the Google Hangout, I handwrote a large majority of the meeting notes. I will type them up later this afternoon and send them over, in addition to the solution pictures.

---

**From:** Keerikkattil, Ranjith (US - Arlington)  
**Sent:** Monday, April 20, 2015 2:30 PM  
**To:** Sawin, Stacy (US - Arlington)  
**Subject:** RE: Hi

Can you send me the draft notes and the solution picture when you get a chance?

**Ranjith Keerikkattil**  
Deloitte Consulting LLP  
1919 North Lynn Street, Arlington, VA, 22209  
Tel/Direct: +1 571 882 5816 | Mobile: +1 571 317 9772 | Fax: +1 855 344 9721  
[rkeerikkattil@deloitte.com](mailto:rkeerikkattil@deloitte.com) | [www.deloitte.com](http://www.deloitte.com)

Please consider the environment before printing.

---

**From:** Keerikkattil, Ranjith (US - Arlington)  
**Sent:** Sunday, April 19, 2015 6:15 PM  
**To:** Sawin, Stacy (US - Arlington)  
**Subject:** Re: Hi

You are confirmed for tomorrow. Plan to get there a bit early. If you don't find Ritesh or Bheeshma from Deloitte, tell the receptionist that you have a meeting with Andrew Horton. Again, call me if you find any issues.

**Ranjith Keerikkattil**

Deloitte Consulting LLP

1919 North Lynn Street, Arlington, VA, 22209

Tel/Direct: +1 571 882 5816 | Mobile: +1 571 317 9772 | Fax: +1 855 344 9721

rkeerikkattil@deloitte.com | www.deloitte.com

Please consider the environment before printing.

On Apr 19, 2015, at 12:37 PM, Keerikkattil, Ranjith (US - Arlington)  
<rkeerikkattil@DELOITTE.com> wrote:

Stacy,

Thank you for your interest in knowing more about the solution. The attached documents should give you an overview. The first attachment is an overview of the current solution. The second one is our proposed solution framework. We need to finalize the products (see below table) that best meets the requirements for this framework. That's what the meeting tomorrow is about. The third deck talks about our current proposal team. I'll be in Rosslyn on Tuesday and we can discuss further.

Area

FPS.1.0 Technology

GDIT Proposed Tech Component

Rationale

Data Integration

Sqoop

Sqoop, SAS DI Studio/Dataflux

- Sqoop for loading data into Cloudera
- SAS DI Studio/Dataflux included in current CPI license
- SAS DI Studio integrates well with SAS Decision Manager
- SAS DI Studio can incorporate SAS code in workflows (Re-using IBM SAS code)

Data Warehousing

Hortonworks

Cloudera/Teradata (Leveraging IDR)

- Execution of the post-pay models on Teradata (IDR) (because that is where the years and years of claims data lives now), and move pre-pay model execution over on to Cloudera (this follows along a little more closely to what Bheeshma was talking to when the four of us talked last Friday)
- Leveraging Cloudera for storing new unstructured data sources added in addition to the current ones.

#### **Business Rules Development**

Custom code

#### **SAS Business Rules Manager**

- In-database execution of business rules
- SAS has provided quals in both commercial and federal space
- Better integration with the rest of the SAS suite.

#### **Model Development**

Custom code

#### **SAS Enterprise Miner**

- Included in current CPI license
- Models developed in Enterprise Miner can be executed in-database
- Easy to use GUI interface for Model Developers

#### **Model Management**

No solution

#### **SAS Model Manager**

- In-database execution of models

#### **Business Rules Execution**

No solution

#### **SAS Business Rules Manager**

SAS Scoring Accelerator for Hadoop/ SAS Scoring Accelerator for Teradata

- Pushes SAS code/PMML/DS2 to run in-database within Hadoop
- Faster business rules execution than FICO Blaze

#### Model Execution

No solution except running custom code in Hadoop

#### SAS Model Manager

SAS Scoring Accelerator for Hadoop/ SAS Scoring Accelerator for Teradata

- Pushes SAS code/PMML/DS2 and EM models to run in-database within Hadoop
- Reduces model execution time

#### Alert Generation

Custom code written in CLIPS

SAS FCM/SAS custom code for additional functionalities

- SAS FCM and SNA are part of CPI's SAS FF license
- Additional customizations can be done with SAS code
- SAS FCM integrates with most of the commercial case management tools

Please do not share these without informing us.

Once you get to the General Dynamics office at 3060 Williams Dr, please go towards the reception on the ground floor and they'll sign you in. You can contact me at 571-317-9772 if you have any questions or run into any issues.

Ranjith Keerikkattil

Deloitte Consulting LLP

1919 North Lynn Street, Arlington, VA, 22209

Tel/Direct: +1 571 882 5816 | Mobile: +1 571 317 9772 | Fax: +1 855 344 9721

[rkeerikkattil@deloitte.com](mailto:rkeerikkattil@deloitte.com) <<mailto:rkeerikkattil@deloitte.com>> |

[www.deloitte.com](http://www.deloitte.com) <<http://www.deloitte.com>>

Please consider the environment before printing.

From: Sawin, Stacy (US - Arlington)

Sent: Sunday, April 19, 2015 12:14 PM  
To: Keerikkattil, Ranjith (US - Arlington)  
Cc: Verma, Ritesh (US - Arlington)  
Subject: RE: Hi

Thank you for the meeting invitation and details. I am looking forward to learning more about the proposal, helping with meeting notes and translating diagrams.

Also, if it's not too inconvenient, I would appreciate it if you could send me notes from prior meetings. I would like to further my understanding of the current state of the proposal and how I should structure my notes.

Thanks!  
Stacy

From: Keerikkattil, Ranjith (US - Arlington)  
Sent: Sunday, April 19, 2015 11:41 AM  
To: Sawin, Stacy (US - Arlington)  
Cc: Verma, Ritesh (US - Arlington)  
Subject: RE: Hi

Will confirm by tonight.

You would need to get to 3060 Williams Drive, Fairfax, VA 22031. I'm out of state tomorrow and will be dialing in. if you don't drive you can take the Orange Line from our Rosslyn office to Dunn Loring Merrifield Metro Station and take a quick Uber/Cab.

We would need your help with taking down the meeting minutes and translating the diagrams during white-boarding into Visio.

I'm also copying Ritesh, the PPD on the proposal effort.

You can charge the time spent on this as well as the cab to CMS10457-BP-LP-1000 CMS B&P 10316609-FPS

Ranjith Keerikkattil  
Deloitte Consulting LLP  
1919 North Lynn Street, Arlington, VA, 22209  
Tel/Direct: +1 571 882 5816 | Mobile: +1 571 317 9772 | Fax: +1 855 344 9721  
[rkeerikkattil@deloitte.com](mailto:rkeerikkattil@deloitte.com)<<mailto:rkeerikkattil@deloitte.com>> |  
[www.deloitte.com](http://www.deloitte.com)<<http://www.deloitte.com>>

Please consider the environment before printing.

From: Sawin, Stacy (US - Arlington)  
Sent: Friday, April 17, 2015 6:06 PM  
To: Keerikkattil, Ranjith (US - Arlington)  
Subject: RE: Hi

Hi, the best number to reach me at is 5033803915. Also, I am available. Keep me



posted.

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "Keerikkattil, Ranjith (US - Arlington)"

<[rkeerikkattil@DELOITTE.com](mailto:rkeerikkattil@DELOITTE.com)<<mailto:rkeerikkattil@DELOITTE.com>>>

Date: 04/17/2015 6:03 PM (GMT-05:00)

To: "Sawin, Stacy (US - Arlington)"

<[ssawin@deloitte.com](mailto:ssawin@deloitte.com)<<mailto:ssawin@deloitte.com>>>

Subject: Hi

Stacy,

What's the best number to reach you? Also are you free on Monday from 9-2? I may need your help if Nick/Conor (BTA's in my account) have conflicts.

Thanks!

Ranjith Keerikkattil

Deloitte Consulting LLP

1919 North Lynn Street, Arlington, VA, 22209

Tel/Direct: +1 571 882 5816<<tel:+12057120882205816>> | Mobile: +1 571

317 9772<<tel:+12057120317209772>> | Fax: +1 855 344

9721<<tel:+12085520344209721>>

[rkeerikkattil@deloitte.com](mailto:rkeerikkattil@deloitte.com)<<mailto:rkeerikkattil@deloitte.com>> |

[www.deloitte.com](http://www.deloitte.com)<<http://www.deloitte.com/>>

Please consider the environment before printing.

<1769-2014.pdf>

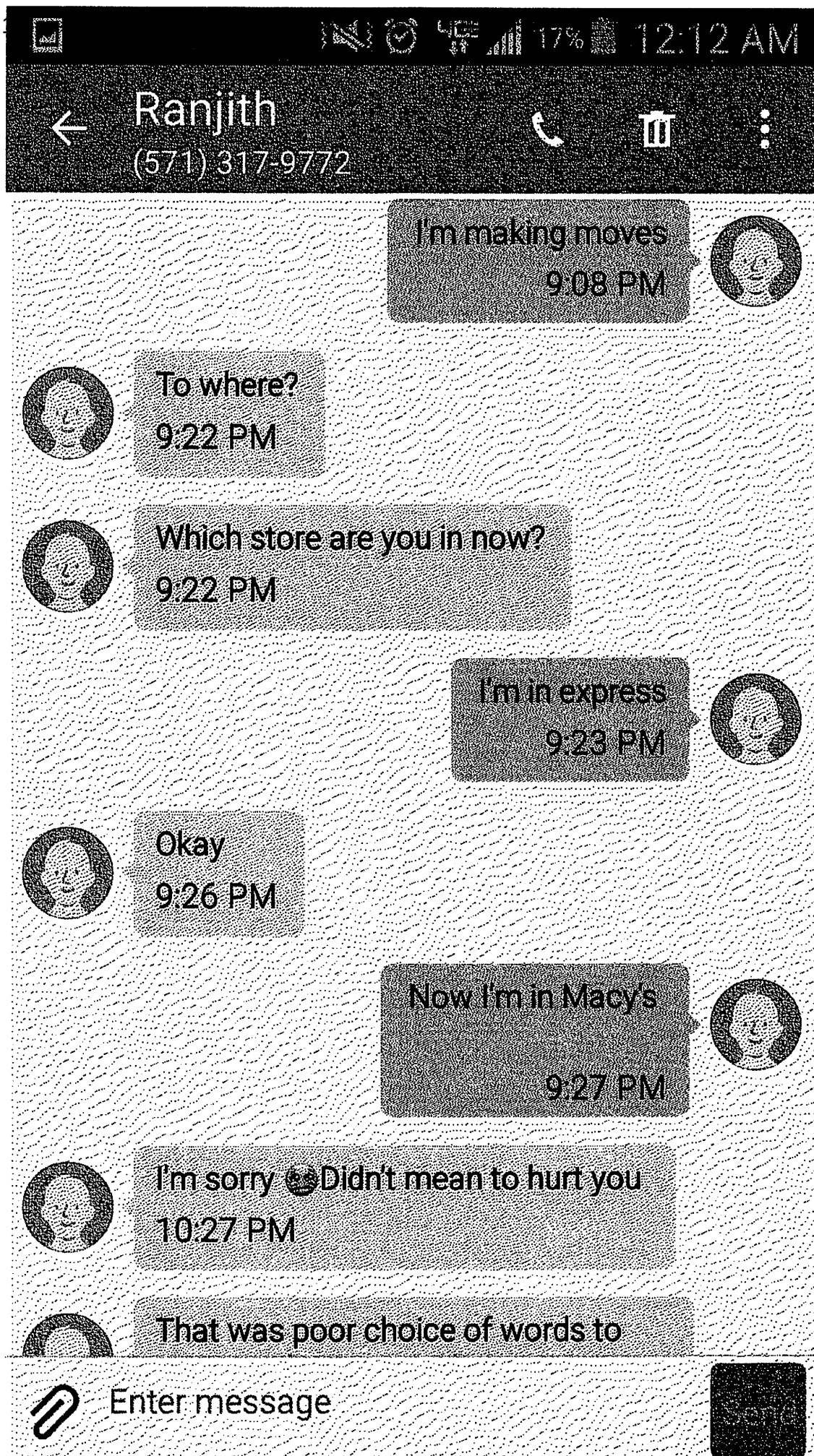
<FPS - Frame-work for Solutions Discussion\_v4.pptx>

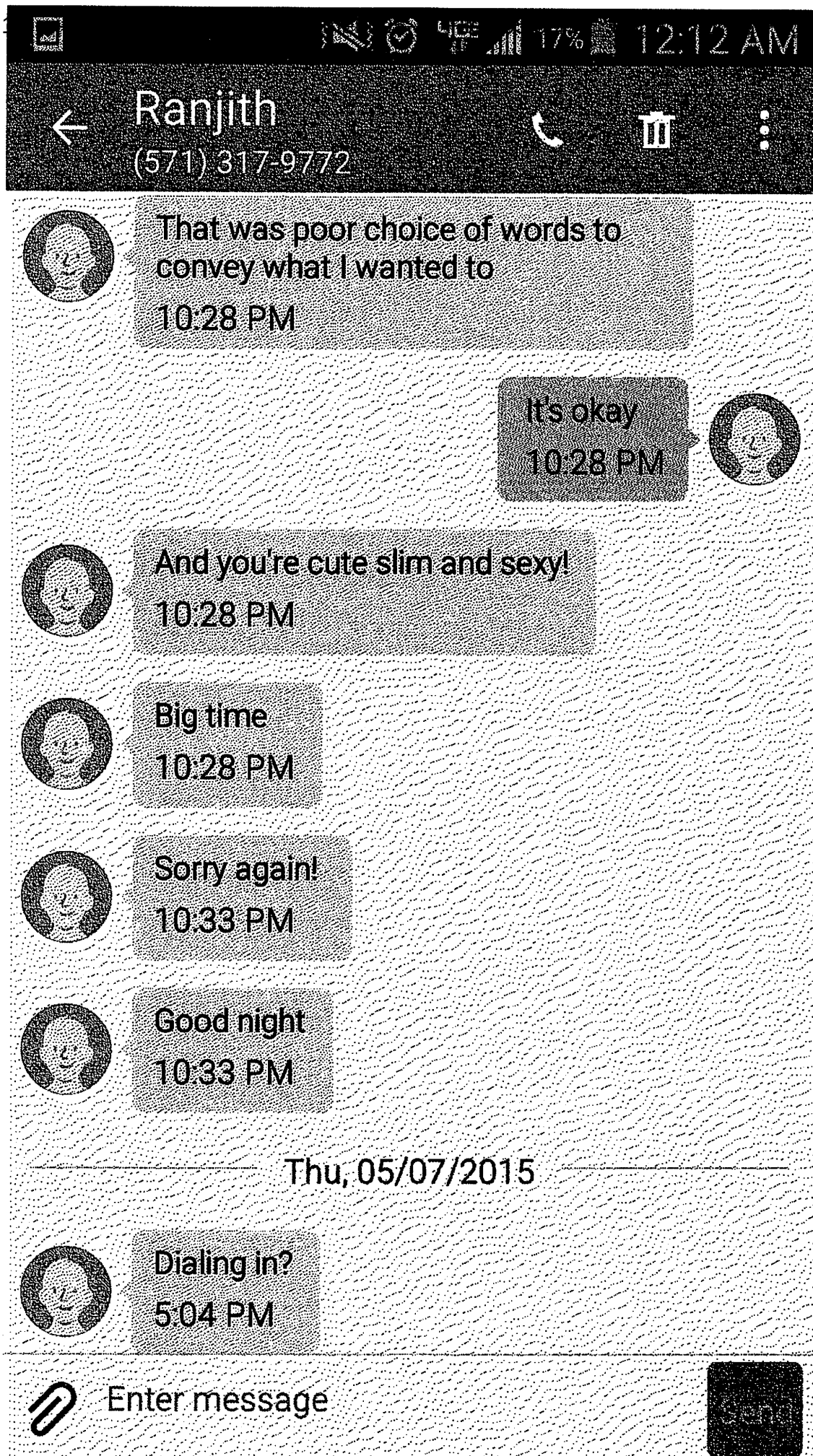
<CMS FPS2 All Hands Status Meeting 04\_09\_15 v3.pptx>

<FPS2 Solution Framework Meeting Minutes Outline.docx>

<Solution Framework pic1.jpg>

**EXHIBIT 3 TO KEERIKKATTIL DECLARATION**





**EXHIBIT 4 TO KEERIKKATTIL DECLARATION**



Ranjith K <rumbc1@gmail.com>

---

## Ranjith, please add me to your LinkedIn network

1 message

---

**Stacy Sawin** <member@linkedin.com>

Sun, May 10, 2015 at 9:10 PM

Reply-To: Sksawin@aol.com

To: Ranjith Keerikkattil <rumbc1@gmail.com>



Stacy Sawin

Hi Ranjith,

I'd like to connect with you on LinkedIn.

**Stacy Sawin**

Federal Business Technology Analyst at Deloitte

[Accept](#)

[View Profile](#)

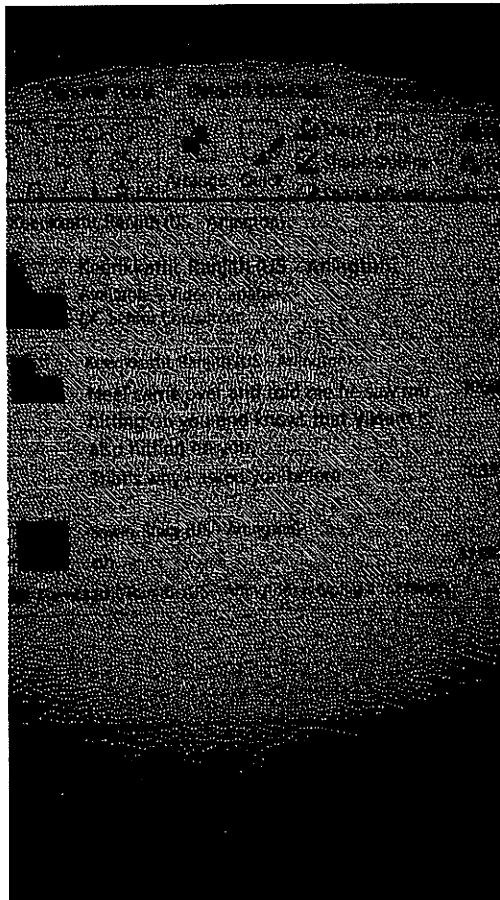
You are receiving Invitation emails. Unsubscribe

This email was intended for Ranjith Keerikkattil (Senior Consultant at Deloitte). Learn why we included this.

If you need assistance or have questions, please contact LinkedIn Customer Service.

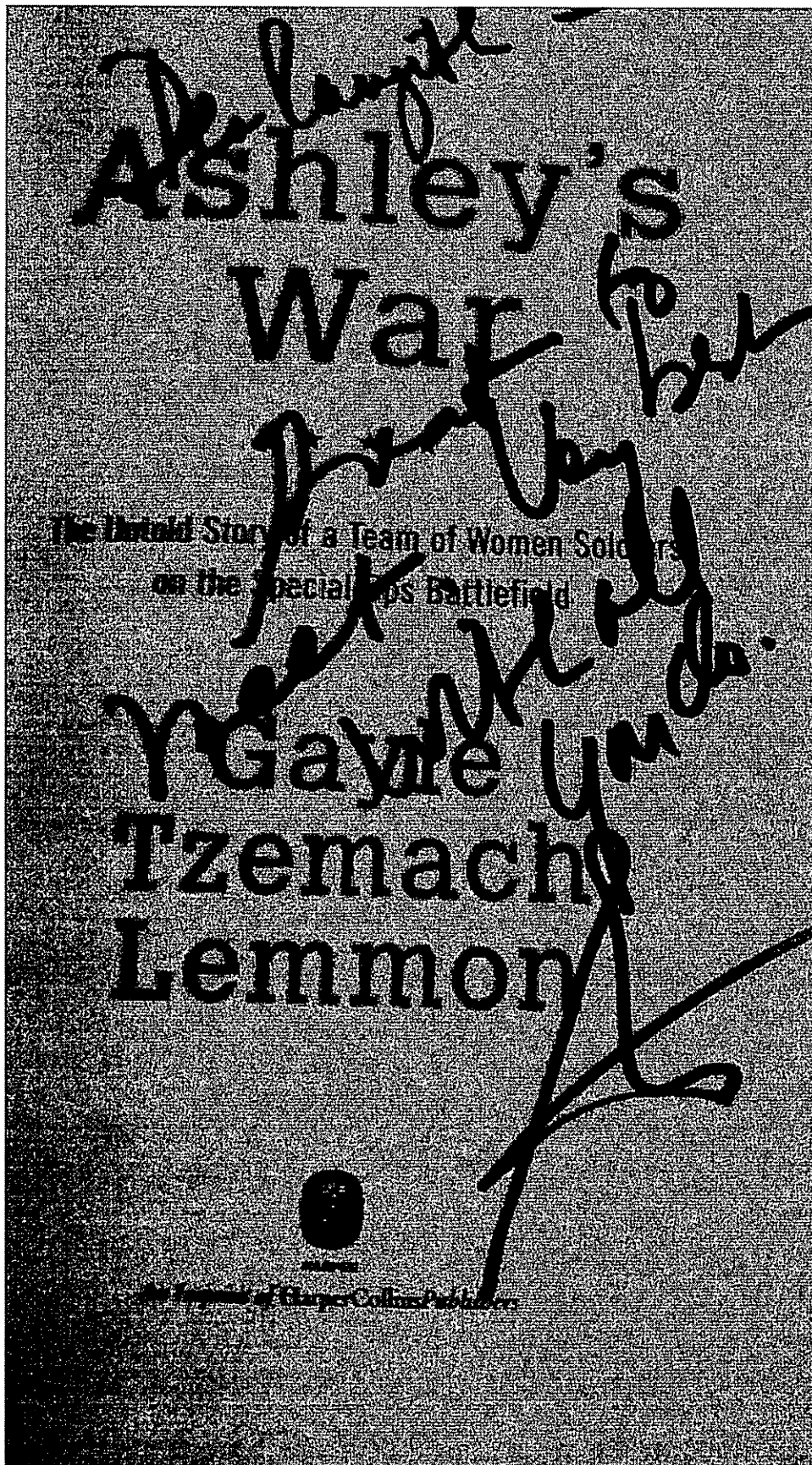
© 2015, LinkedIn Corporation. 2029 Stierlin Ct. Mountain View, CA 94043, USA

**EXHIBIT 5 TO KEERIKKATTIL DECLARATION**





**EXHIBIT 6 TO KEERIKKATTIL DECLARATION**



**EXHIBIT 7 TO KEERIKKATTIL DECLARATION**

---

**From:** Keerikkattil, Ranjith (US - Arlington)  
**Sent:** Sunday, May 31, 2015 10:31 PM  
**To:** Sawin, Stacy (US - Arlington)  
**Cc:** Keerikkattil, Ranjith (US - Arlington)  
**Subject:** FPS Future Guidance and Cease & Desist Letter

**Importance:** High

Dear Ms. Sawin,

As part of my changing priorities, I would not be directly involved with you in any actual/perceived administrative role including but not limited to FPS. Please work with Ritesh Verma and/or Bheeshma Tumati to determine the support they need from you with respect to FPS. I have already sent you a sample e-mail for reference. Please do not involve me in requesting time off from your project with respect to FPS. Please check your service hours summary and inform Ritesh Verma if you are close to enough hours for a PE so that you are duly recognized for your contributions. I would be more than happy to share any information regarding your performance to date, to the best of my knowledge, information and/or belief, within my possession or control, if requested by a third-party fact finder. Please let me know if you have any questions or concerns regarding the above by COB tomorrow. Also, please refrain from contacting me except for legitimate business needs of Deloitte LLP.

Sincerely,

Ranjith Keerikkattil

**Ranjith Keerikkattil**  
Deloitte Consulting LLP  
1919 North Lynn Street, Arlington, VA, 22209  
Tel/Direct: +1 571 882 5816 | Mobile: +1 571 317 9772 | Fax: +1 855 344 9721  
[rkeerikkattil@deloitte.com](mailto:rkeerikkattil@deloitte.com) | [www.deloitte.com](http://www.deloitte.com)

Please consider the environment before printing.

CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information or otherwise be protected by law. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.